

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

NOV 1 6 2016

Mr. Bill Brick Chief, Monitoring and Technical Services San Diego Air Pollution Control District 10124 Old Grove Road San Diego, California 92131-1640

Dear Mr. Brick:

Thank you for your submission of the San Diego Air Pollution Control District (SDAPCD) Annual Air Quality Monitoring Network Plan 2015 in July 2016. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval we also formally approve the following system modifications: discontinuation of Pb at the El Cajon – Floyd Smith Drive NCore site (AQS ID: 06-073-1018). More information about this approval is in Enclosure D.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The third enclosure (*C. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the third. All comments conveyed via this letter (and enclosures) should be addressed (through corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Michael Flagg (415) 972-3372.

Sincerely,

Gwen Yoshimura, Acting Manager

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Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Additional Items Requiring Attention
- C. Annual Monitoring Network Plan Checklist
- D. Approval of Discontinuation of Pb at NCore

cc (via email): David Shina, SDAPCD David Craig, SDAPCD

Rebekka Fine, CARB

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- Per 40 CFR 58.11(c), NCore, PAMS, and STN network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items.
 - o Relocation of El Cajon Floyd Smith Drive to Lexington Elementary School
- System modifications (e.g., site closures or moves) are subject to approval per 40 CFR 58.14(c). Information provided in the plan was insufficient for EPA to approve the system modifications listed in the plan per the applicable requirement. Therefore, we are not acting on the following items as part of this year's annual network plan (see Checklist Rows 3):
 - o Relocation of Perkins Elementary School to Sherman Elementary School
 - Relocation of Escondido
- EPA identified items in your agency's annual monitoring network plan where a
 requirement was not being met or information in the plan was insufficient to judge
 whether the requirement was being met based on 40 CFR 58.10 and the associated
 appendices. Therefore, we are not acting on the following items:

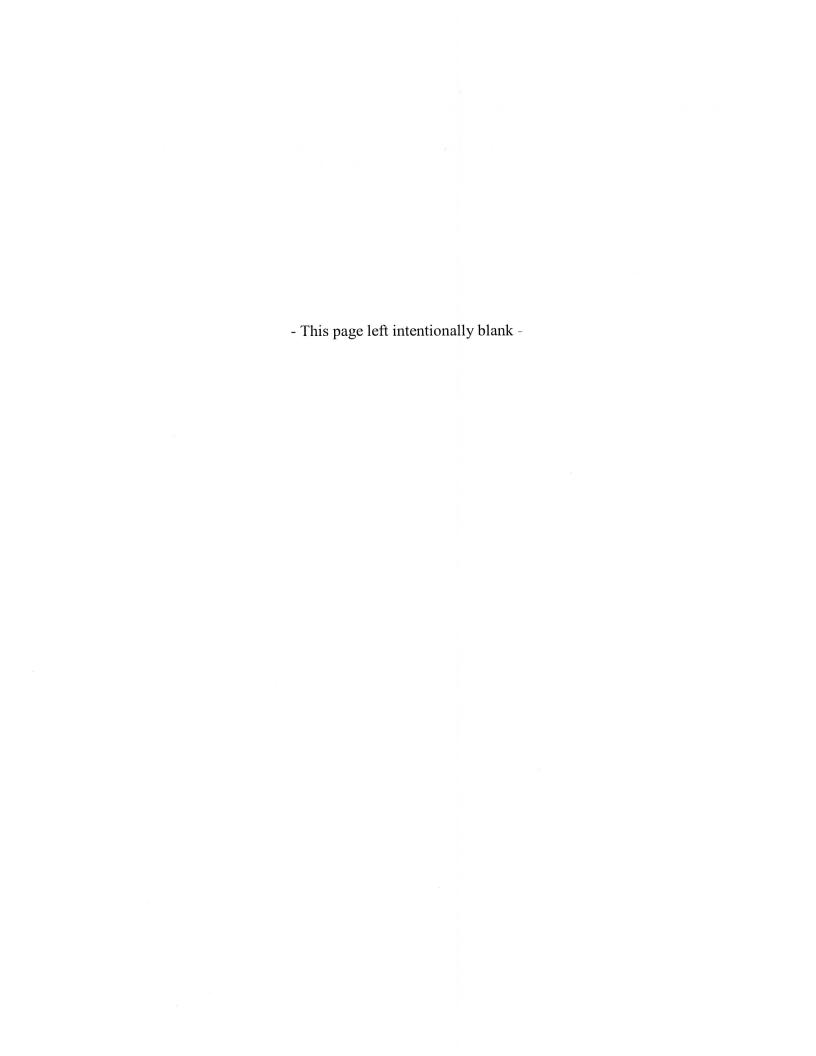
Item	Checklist Row	Issue
PM _{2.5} near-road monitor in CBSA ≥ 2.5 million	30	Not meeting the requirement
2^{nd} NO ₂ near-road monitor in CBSA ≥ 2.5 million	57	Not meeting the requirement
Distance from supporting structure	81	Not meeting the requirement in some instances
Modifications to SLAMS network	3	Insufficient information to judge
Dates of last PM _{2.5} semi- annual flow audits	36	Not meeting requirement in one instance
Distance between QA collocated monitors	18	Insufficient information to judge
For low volume PM, distance to all other PM instruments > 1 m	19	Insufficient information to judge
For high volume PM, distance to all other PM instruments > 2 m	20	Insufficient information to judge

Precision/Accuracy reports submitted to AQS	12	Insufficient information to judge
Data certification submitted to AQS	13	Insufficient information to judge
Submit plan by 7/1/2016	1	Not meeting requirement

Additional information for each of these items may be found for the row listed in column 2, in the third enclosure (*C. Annual Monitoring Network Plan Checklist*).

B. Additional Items Requiring Attention

• [Item 71] The Escondido and SD-Beardsley PM_{2.5} FRM SLAMS monitors should have a Site Type of "Highest Concentration". Please correct for next year's ANP.



C. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated February 10, 2016)

Year: 2016

Agency: San Diego Air Pollution Control District (SDAPCD)

stations, and/or, in serious, severe and extreme ozone nonattainment areas, and PAMS stations. monitoring stations including FRM, FEM, and ARM monitors that are part of SLAMS, NCore stations, STN stations, State speciation stations, SPM 40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) include information regarding the following types of monitors: SLAMS

requirements listed in 58.10 along with those in Appendices A, C, D, and E. each monitor meets the requirements of appendices A, C, D, and E of this part, where applicable." On this basis, review of the ANPs is based on the 40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of purposes for each monitor and evidence that siting and operation of

Administrator are: PAMS, NCore, and Speciation (STN/CSN). Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the

comments on its contents and structure. contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its

Key:

WILLE	meets the requirement	
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP	
	process (items listed in Enclosure A).	
Green	Green item requires attention in order to improve next year's plan (items listed in Enclosure B).	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? If yes, page #s. Flag if	Does the information provided ⁴ meet the requirement? ⁵	Notes
GENE	GENERAL PLAN REQUIREMENTS		incorrect ³ ?		
1.	Submit plan by July 1st	58.10 (a)(1)	,	Z	Plan submitted on July 19, 2016
6	30-day public comment / inspection period6	58.10 (a)(1), 58.10 (a)(2)	Y, Chapter 1 p. 2	>	
.; 3	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Y, Chapter 2 P.15-16, Appendix A & B	Insufficient Info	At this time there is insufficient information to formally approve the following system modifications: • Relocation of DTN to SES • Relocation of ESC
					Relocation of FSD to LES
4.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2) 58.10 (b)(5) 58.10(e) 58.14	Y, Chapter 2 Appendix C	>	See enclosure C
5.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		N/A	N/A	
9		58.10 (b)(5)	Y, Chapter 2 p.15-16	٨	
7.	A plan for establishing a near-road PM _{2.5} monitor (in CBSAs \geq 2.5 million) by 1/1/2015 (plan was due July 1, 2014)	58.10(a)(8)(i)	Y, Chapter 8 p. 8	>	

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, Incomplete, Incorrect. The responses "Incomplete" and "Incorrect" assume that some information has been provided.

³ To the best of our knowledge.

⁴ Assuming the information is correct

⁵ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge.

⁶ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

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		ANP requirement	Citation within 40 CFR 581	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided meet the requirement?	Notes
	.8	A plan for establishing a near-road PM _{2.5} monitor (in CBSAs \geq 1 million and \leq 2.5 million) by 1/1/2017 (plan due July 1, 2016)	58.10(a)(8)(ii)	N/A	N/A	
	9.	A plan for establishing a near-road CO monitor (in CBSAs \geq 2.5 million) by 1/1/2015 (plan was due July 1, 2014)	58.10(a)(7) 58.13(e)(1)	Y, Chapter 5 p.3	~	
	10.	A plan for establishing a near-road CO monitor (in CBSAs ≥ 1 million and ≤ 2.5 million) by $1/1/2017$ (plan due July 1, 2016)	58.10(a)(7) 58.13(e)(1)	N/A	N/A	
	11.	NO ₂ plan for establishment of 2 nd near-road monitor by 1/1/2015 (plan was due July 1, 2014)	58.10 (a)(5)(iv)	Y, Chapter 4 p.3	4	
_	12.	Precision/Accuracy reports submitted to AQS	58.16(a); App A, 1.3 and 5.1.1	Z	Insufficient Info	Information was not provided.
	13.	Annual data certification submitted	58.15 App. A 1.3	N	Insufficient Info	Information was not provided.
	14.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁷	58.11 (a) (2)	N/A	N/A	
	15.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met.8	58.20(c)	N/A	N/A	
	16.		App D 2(e)	N/A	N/A	

⁷ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁸ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40	Was the information	Does the information	Notes
		CFK 38.	yes, page #s. Flag if incorrect??	provided meet the requirement? ⁵	
GENE	GENERAL PARTICULATE MONITORING REQUIREMENTS (PM10, PM25, Pb-TSP, Pb-PM10)	ENTS (PM10, PM	L25, Pb-TSP, Pb-PM10	0	
	17. Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	Need to determine collocation	Y, Appendix 1-12	٨	
18.	8. Distance between QA collocated monitors (Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.)	App. A 3.2.5.6 and 3.2.6.3	Y, Appendix 1-12	Insufficient Info	Most of the Site Descriptions included in the plan have "N/A" for distance between collocated monitors. Please include the distance between collocated monitors for the appropriate sites.
1	19. For low volume PM instruments (flow rate < 200 liters/minute), all other PM instruments are > 1 m from the lovol. If no, list distance (meters) and instruments.	App E	Y, Appendix 1-12	Insufficient Info	The Site Descriptions included in the plan have "N/A" for distance between collocated monitors. Please include the distance between PM monitors for the appropriate sites.
2	20. For high volume PM instruments (flow rate > 200 liters/minute), all other PM instruments are > 2m from the hivol. If no, list distance (meters) and instruments.	Арр Е	Y, Appendix 1-12	Insufficient Info	The Site Descriptions included in the plan have "N/A" for distance between collocated monitors. Please include the distance between PM monitors for the appropriate sites.
PM2.5	PM2.5 -SPECIFIC MONITORING REQUIREMENTS				
2	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Y, Chapter 8 p. 6	>	
7	22. Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with NAAQS-comparable monitor at the required sample frequency.]	58.11 (e)	N/A	N/A	
2	S3. Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.7.1(a) and Table D-5	Y, Chapter 8 p.4-5	>-	

	ANP requirement	Citation	Was the	Does the	Notes
		within 40 CFR 58 ¹	information submitted? ² If yes, page #s. Flag if incorrect ³ ?	information provided ⁴ meet the requirement? ⁵	
PM ₁₀	PM10—SPECIFIC MONITORING REQUIREMENTS				
37.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D, 4.6 (a) and Table D-4	Y, Chapter 9 p. 3-4	٨	
38.		App A 3.3.1	Y, Chapter 2, p. 13, Chapter 9, p.2	*	
39.	. Sampling schedule for PM ₁₀	58.10 (b)(4) 58.12(e) App D 4.6	Y, Chapter 9 p.5	>	
40.	Frequency of flow rate verification for manual PM ₁₀ monitors audit	App A 3.3.2	Y, Appendix 1-12	λ	
41.		App A 3.2.3	N/A	N/A	
42.		App A, 3.2.4 and 3.3.3	Y, Appendix 1-12	γ	
Pb -SP	Pb -SPECIFIC MONITORING REQUIREMENTS		W. S. B. M. Chill		
43.	. Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5 58.13(a)	Y, Chapter 7 p.3-5	>	
44.		App A 3.3.4.3	Y, Chapter 2, p.8	>	
45.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	N/A	N/A	
46.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	N/A	N/A	
47.	12-14-12-12-12-12-12-12-12-12-12-12-12-12-12-	58.10 (b)(9)	Y, Chapter 2, p. 8 Appendix 1-12	*	
48.	. Sampling schedule for Pb	58.10 (b)(4) 58.12(b) App D 4.5	Y, Appendix 1-12	>	
49.	. Frequency of flow rate verification for Pb monitors audit	App A 3.3.4.1	Y, Appendix 1-12	*	

	ANP requirement	Citation within 40 CFR 581	Was the information submitted? ² If yes, page #s. Flag if incorrect ³⁹	Does the information provided meet the requirement?	Notes
50.	Dates of two semi-annual flow rate audits conducted in CY2015 for Pb monitors	App A 3.3.4.1	Y, Appendix 1-12	Y	
GENER	GENERAL GASEOUS MONITORING REQUIREMENTS				
51.	Frequency of one-point QC check (gaseous)	App. A 3.2.1	Y, Appendix 1-12	: <	
52.	Date of Annual Performance Evaluation (gaseous) conducted in CY2015	App. A 3.2.2	Y, Appendix 1-12	Υ	
O ₃ –SPI	O3 -SPECIFIC MONITORING REQUIREMENTS				
53.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D, 4.1(a) and Table D-2	Y, Chapter 3 p. 3-4	Υ	
54.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Y, Chapter 2 p.7	*	
55.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4) App D, 4.1(i)	Y, Appendix 1-12	×	
NO2-S	NO2 -SPECIFIC MONITORING REQUIREMENTS				
56.	Minimum monitoring requirement for single near-road NO ₂ monitor (in CBSA ≥ 1 million) by 1/1/2014. [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	58.13(c)(3) App D 4.3.2	Y, Chapter 4 p.3-4	Y	

	ANP requirement	Citation	Was the	Does the	Notes
		WITHIN 40 CFR 58 ¹	submitted? ² If yes, page #s. Flag if incorrect ³ ?	nnormation provided ⁴ meet the requirement? ⁵	
70.	. Basic monitoring objective for each monitor	App D 1.1 58.10 (b)(6)	Y, Appendix 1-12	>	
71.	. Site type for each monitor	App D 1.1.1	Y, Appendix 1-12	Incorrect	The Escondido and SD-Beardsley PM _{2.5} FRM SLAMS monitors should have a Site Type of "Highest Concentration". Please correct for next year's ANP.
72.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Appendix 1-12	>	
73.	. Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, Appendix 1-12	>	
74.	. Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Appendix 1-12	>	
75.	 Method code and description (e.g., manufacturer & model) for each monitor 	58.10 (b)(3); App C 2.4.1.2	Y, Appendix 1-12	٨	
76.	5. Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Appendix 1-12	>-	
77.	7. Distance of monitor from nearest road	App E 6	Y, Appendix 1-12	٨	

		Citation within 40 CFR 581	Was the information submitted? ² If yes, page #s. Flag if incorrect ³ ?	Does the information provided meet the requirement?	Notes
78.	8. Traffic count of nearest road	App E	Y, Appendix 1-12	Υ	
7.	79. Groundcover	App E 3(a)	Y, Appendix 1-12	Y	
80	80. Probe height	App E 2	Y, Appendix 1-12	Υ	
81.		App E 2	Y, Appendix 1-12	Insufficient Info	Most of the Site Descriptions included in the plan have "N/A" for distance to supporting structure. Please include the distance from the supporting structure for all monitors in the network. This specifically refers to the distance of the inlet to the rooftop, platform, or other supporting structure.
82.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Y, Appendix 1-12	Y	
83.	3. Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Y, Appendix 1-12	Y	
, oo	84. Distance from the drip line of closest tree(s)	App E 5	Y, Appendix 1-12	~	
85.	5. Distance to furnace or incinerator flue	App E 3(b)	Y, Appendix 1-12	Υ	
	86. Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, Appendix 1-12	4	
∞	87. Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, Appendix 1-12	~	
∞	88. Residence time (NO/NO ₂ /NO ₃ , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, Appendix 1-12	Υ	
The second second				١	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?

No

If no, skip the remaining questions.

ves:

- Were any of the comments substantive?
- o If yes, which ones?
- o Explain basis for determination if any comments were considered not substantive:
- Did the agency respond to the substantive comments?
 - o If yes, was the response adequate?
- Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?
- Are the sections of the annual network plan that received substantive comments approvable after consideration of comments?
- If yes, provide rationale:

D. Approval of Discontinuation of Pb at NCore

EPA has also specifically reviewed your June 27, 2016 letter requesting approval to discontinue lead (Pb) monitoring at your El Cajon-Floyd Smith Drive NCore site. As part of this year's annual network plan review, EPA approves closure of the Pb monitor at the El Cajon – Floyd Smith Drive NCore site (AQS ID: 06-073-1018, POC 1).

SDAPCD began monitoring for Pb at El Cajon – Redwood (AQS ID: 06-073-0003) on February 19, 2012. The El Cajon – Redwood site was shut down on February 22, 2014 and relocated to the El Cajon – Floyd Smith Drive site on September 8, 2014. The relocation was approved on April 16, 2014. The highest three-month rolling average of Pb measured from February 2012 through the first quarter of 2016 was $0.01~\mu\text{g/m}^3$. As stated in the preamble to the revised monitoring rule (81 FR 17259), EPA anticipated that waiver requests for shutdown of Pb monitoring at urban NCore sites would be received based on three years of data showing design values well below the 2008 Pb National Ambient Air Quality Standards (NAAQS).

Based on these data, EPA approves this shutdown based on a case-by-case approval per 40 CFR 58.14(c). Discontinuance does not compromise data collection needed for implementation of the Pb NAAQS, and the requirements of Appendix D will continue to be met after this monitor is closed as Pb monitoring is no longer required at urban NCore sites.